

NOAA's Grants Management Division

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Current

2015

What's New In Financial Assistance

Post Award Actions

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Congratulations!



- Now what?
 - Complete the goals outlined in your application while abiding by the regulations and policies that were incorporated into your Federal Financial Assistance Award.
- As work progresses, changes occur and sometimes you need to make modifications during the life of the grant.

Prior Approval?



- When a recipient is required to obtain approval before taking certain actions with respect to a grant or cooperative agreement.



Post Award Actions That Always Require Prior Approval

- Change of Scope
- The absence or change in Principal Investigator or Key Personnel
- Request for additional funding
- Sub awarding and transfer of work not in original application
- Changes in the amount of approved cost-sharing

Change In Scope



- Change in the specific goals and objectives approved at the time of award.
- Shift of the research emphasis.
- Change in the approved project areas or species.
- Change in the amount of work from the approved project description.
- Considered for legal review.
- Generates amendment in grant file.



Change In Key Personnel

- Principal Investigator or key personnel needs to be replaced on the project.
- It is required to provide resume or CV for new person.
- Submission is Online.



Absence of Principal Investigator

- The PI has reduced the effort towards the project by 25% or absence of more than 3 months, this requires prior approval, justification stating reason for absence, any adverse effect on the project (if applicable) and plan for the absence.

Subawarding and Transfer of work **Not in Original Application**

- If not described in the approved application, the recipient may not grant a sub-award, transfer, or contract out any work under the award without prior approval.
- You must choose the method of selection (competitive or non-competitive), a description of the work, and a justification if the sub-award was chosen non-competitively.
- Generates an amendment

Example:

The Principal Investigator takes a position at a new university but still wants to work on the project.

- If the original university intends to keep the grant then they can subaward to the new university. The main university must identify a new Principal Investigator to oversee the project and new subaward.

Post Award Actions That Require Prior Approval Continued...

- No Cost Extensions*
- Extension to Closeout
- Foreign Travel*
- Reprogram/Rebudget*
- Preaward Costs*
- Carry forward unobligated balances to subsequent periods of performance*

Prior Approval Waived for Research Awards

No Cost Extensions

- No Cost Extension – Without Invocation of Expanded Authority
 - The request to extend the award period should be submitted in Grants Online at least 30 days prior to the expiration of the award.
 - The request should clearly justify why the extension is needed and explain what activities are remaining to be accomplished under the award and what funds are still available to support the activity.
- No Cost Extension – Invocation of Expanded Authority Waived -which only applies to research grants
 - All non-federal entities under 2 CFR Part 200.220 and 230 (e.g., educational institutions/non-profits) are granted authority to initiate a one-time no-cost extension to the award period of up to one year without prior approval.
 - Grants Office must be notified in writing at least 10 days prior to expiration of the award with an explanation of the reason for the extension.
 - Expanded authority must be used before prior approval
- Generates an amendment

Foreign Travel

- Foreign travel is identified as travel outside the United States and Territories.
 - An action is required if the travel was not identified in the application with the Fly America Act requirements.
 - Fly America Act
 - If all legs of travel is not completely American owned the following is required:
 - Fly America Act Checklist
 - Bilateral agreement documentation (if applicable)
 - Full name; dates of travel; origin and destination of travel; detailed itinerary of travel, name of the air carrier and flight number for each leg of the trip



Prior approval waived for Research Grants

Reprogram/Rebudget

- Prior approval required when:
 - The Federal share of award exceeds the Simple Acquisition Threshold (\$150,000)* and the cumulative amount of transferred funds exceed 10% of the total budget as last approved by the Federal awarding agency.
 - Transfer of funds into a budget category that have yet to be funded

Recipient must submit same budget forms as provided in the application with clear picture of how the funds were moved around. Justification should explain why the rebudget/reprogram is needed.

Pre-Award Costs



- Research awards have prior approval waived for costs incurred 90 days before the start date.
 - More than 90 days require prior approval.
- Non-research awards need prior approval for any costs incurred before the start date.
- All pre-award costs are incurred at the recipient's risk.

Prior approval waived for Research Grants

Additional Post Award Actions

- Satisfy Special Award Conditions
- Termination for Convenience
- Transfer of Award



Termination for Convenience

- For reasons outside of the non-Federal entity's control, the work cannot be completed.
- Non-Federal entity finishes the project tasks significantly prior to the award project period end date.
 - Completes or anticipates completion of the award's financial transactions within 90 days of the requested early termination date.

Transfer of Award



The transfer of award is the release of a project from one primary grantee to another.

- The transfer should be discussed with the Grants Officer and Program Officer early in the planning stages.
- The Organization that is transferring the Award initiates the Transfer by submitting the request through the Transfer Award Action Request.
- A justification for the transfer is required.
- The approval of Transfer of Award request will result in the termination of the existing award by way of amendment and the issuance of a new award to the new recipient.



Generates an amendment

Satisfy Special Award Conditions

Special requirements placed upon the award due to various reasons.

- Lack of indirect cost rate
- High risk
- Credit check (poor credit scores)



Extension to Closeout



- Allows for an extension to closeout beyond the standard 90 days.
 - Up to 60 days beyond original closeout period
 - All activities during the extension must be consistent with closeout.
 - Finalize financial, progress, tangible property, etc.
 - Liquidate obligations incurred.



Incorporating Post Award Actions in Grants Online

No Cost Extension - Without Invocation of Expanded Authority

Extension to Close Out

Change in Scope

Transfer of Award

Change in Principal Investigator

Change in Institution Name

Change in Key Person Specified in the Application

Satisfied Special Award Conditions

Transfer of funds allotted for training to other categories of expenses

Pre-Award Cost

No Cost Extension - Invocation of Expanded Authority

Reprogram or Rebudget

Equipment Purchase

Foreign Travel

Sole Source Contract

Other

Absence of more than 3 months or 25% by project director or PI

Inclusion of cost that require prior approval based on cost principles

Sub award, transfer or contracting out of any work under the award if not described in the approved application

Termination for Convenience



Grantees:

Please note that the above listing contains all the possible Award Action Requests that can be created on this Award.

While the ability to create these Award Action Requests is given to all grantee users, they can only be forwarded to the agency by the Authorized Representative.

- http://www.corporateservices.noaa.gov/grantsonline/Documents/AAR_Assistance/Recipient_AAR_Help.htm



Actions in Grants Online

- The non-Federal entities must adhere to the following when submitting a post award request in Grants Online:
 - Submit appropriate documentation for designated request in accordance with established timelines.
 - Ensure that all reports submissions are up to date (financial and progress).
 - Adhere to all administrative terms and conditions when related to post award activity such as:
 - When a request should be submitted; and
 - Who should submit the request
 - Make sure that all amendments have been accepted by the recipient authorized representative.
 - Actions will go to the Program Office and will be recommended for approval to the Grants Office.

Post Award Actions Will Not Be Approved...

- If financial reports are delinquent.
- If progress reports are delinquent.
- Until all special award conditions are satisfied.
- Until pending countersigned amendments are accepted by the recipient.



- Poor justification
- Missing required documentations
 - Remaining budget (for no-cost extensions)
 - Required revised budget (SF-424a) for Reprogram/Rebudget request
 - Resume or Curriculum Vitae for change in person
- Not submitting actions on time
- Not satisfying existing Special Award Conditions, when submitting an award action request (Financial and Performance reports)



Key Takeaways

- Timely Submission
- Communication
- 2 CFR Part 200.308 – Revision and Budget and Program Plans



QUESTIONS?

